

1 QUINN EMANUEL URQUHART & SULLIVAN, LLP  
2 Charles K. Verhoeven (Bar No. 170151)  
3 charlesverhoeven@quinnemanuel.com  
4 David A. Perlson (Bar No. 209502)  
5 davidperlson@quinnemanuel.com  
6 Melissa Baily (Bar No. 237649)  
7 melissabaily@quinnemanuel.com  
8 John Neukom (Bar No. 275887)  
9 johnneukom@quinnemanuel.com  
10 Jordan Jaffe (Bar No. 254886)  
11 jordanjaffe@quinnemanuel.com  
12 50 California Street, 22<sup>nd</sup> Floor  
13 San Francisco, California 94111-4788  
14 Telephone: (415) 875-6600  
15 Facsimile: (415) 875-6700

16 Attorneys for WAYMO LLC

17 UNITED STATES DISTRICT COURT

18 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

19 WAYMO LLC,

20 CASE NO. 3:17-cv-00939-WHA

21 Plaintiff,

22 vs.  
23 **DECLARATION OF LINDSAY COOPER  
24 IN SUPPORT OF DEFENDANTS'  
25 ADMINISTRATIVE MOTION TO FILE  
26 UNDER SEAL PORTIONS OF THEIR  
27 OPPOSITION TO WAYMO'S MOTION  
28 TO COMPEL PRODUCTION OF  
DOCUMENTS AND RESPONSES TO  
EXPEDITED INTERROGATORIES AND  
EXHIBITS THERETO (DKT. 748)**

29 UBER TECHNOLOGIES, INC.;  
30 OTTOMOTTO LLC; OTTO TRUCKING  
31 LLC,

32 Defendants.

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1 I, Lindsay Cooper, declare as follows:

2       1. I am an attorney licensed to practice in the State of California and am admitted to  
 3 practice before this Court. I am an associate at the law firm Quinn Emanuel Urquhart & Sullivan,  
 4 LLP, counsel for the Plaintiff Waymo LLC (“Waymo”). I have personal knowledge of the matters set  
 5 forth in this Declaration, and if called as a witness I would testify competently to those matters.

6       2. I make this declaration in support of Defendants’ Administrative Motion to File Under  
 7 Seal Portions of Their Opposition to Waymo’s Motion To Compel Production of Documents and  
 8 Responses to Expedited Interrogatories and Exhibits Thereto (Dkt. 681-3) (the “Administrative  
 9 Motion”). Waymo seeks an order sealing the following materials attached to the Administrative  
 10 Motion:

Document	Portions For Which Waymo Supports Sealing
Defendants’ Opposition to Waymo’s Motion to Compel (“Opposition”)	Green Highlighted Portions Outlined in Red <sup>1</sup>
Exhibit 3	Entire Document

15       3. Specifically, the Opposition and Exhibit 3 contain or refer to trade secret and  
 16 confidential business information, which Waymo seeks to seal.

17       4. Portions of the Opposition (outlined in red) and Exhibit 3 contain, reference, and/or  
 18 describe Waymo’s asserted trade secrets. The information Waymo seeks to seal includes reference to  
 19 the development, confidential design and functionality of Waymo’s proprietary autonomous vehicle  
 20 system, which Waymo maintains as secret. I understand that these trade secrets are maintained as  
 21 secret by Waymo (Dkt. 25-47) and are valuable as trade secrets to Waymo’s business (Dkt. 25-31).  
 22 The public disclosure of this information would give Waymo’s competitors access to in-depth  
 23 descriptions—and analysis—of the functionality of Waymo’s autonomous vehicle system. If such  
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 26<sup>1</sup> A version of Defendants’ Opposition with Waymo’s confidential and trade secret information  
 27 outlined in red will be filed concurrently herewith.

1 information were made public, I understand that Waymo's competitive standing would be  
2 significantly harmed.

3 5. Waymo's request to seal is narrowly tailored to those portions of the Opposition and  
4 Exhibit 3 that merit sealing.

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6 I declare under penalty of perjury under the laws of the State of California and the United  
7 States of America that the foregoing is true and correct, and that this declaration was executed in San  
8 Francisco, California, on June 29, 2017.

9 By /s/ Lindsay Cooper  
10 Lindsay Cooper  
11 Attorneys for WAYMO LLC

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14 **SIGNATURE ATTESTATION**

15 Pursuant to Local Rule 5-1(i)(3), I attest under penalty of perjury that concurrence in the  
16 filing of this document has been obtained from Lindsay Cooper.

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/s/ Charles K. Verhoeven  
Charles K. Verhoeven

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